
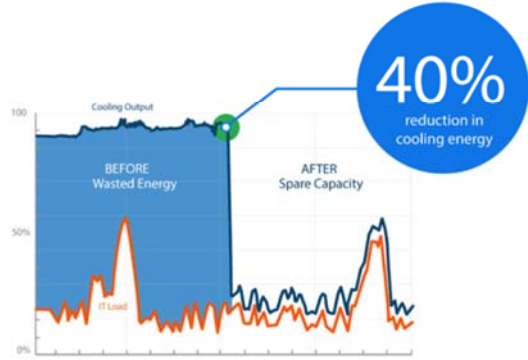


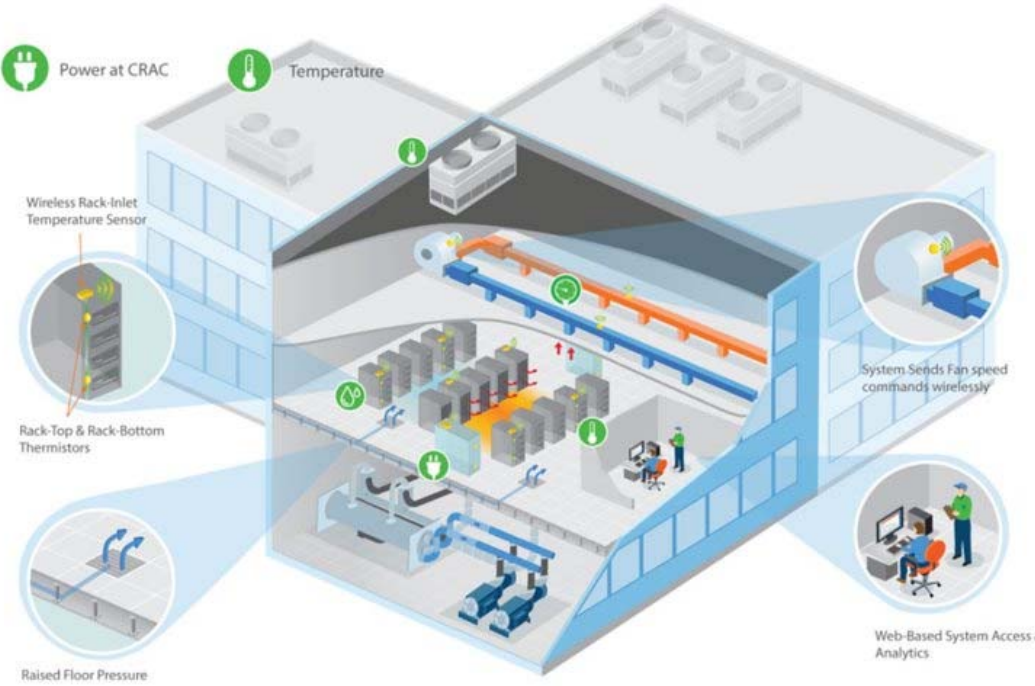
Exhibit 9

U.S. Patent No. 6,854,287 – Infringement Claim Chart

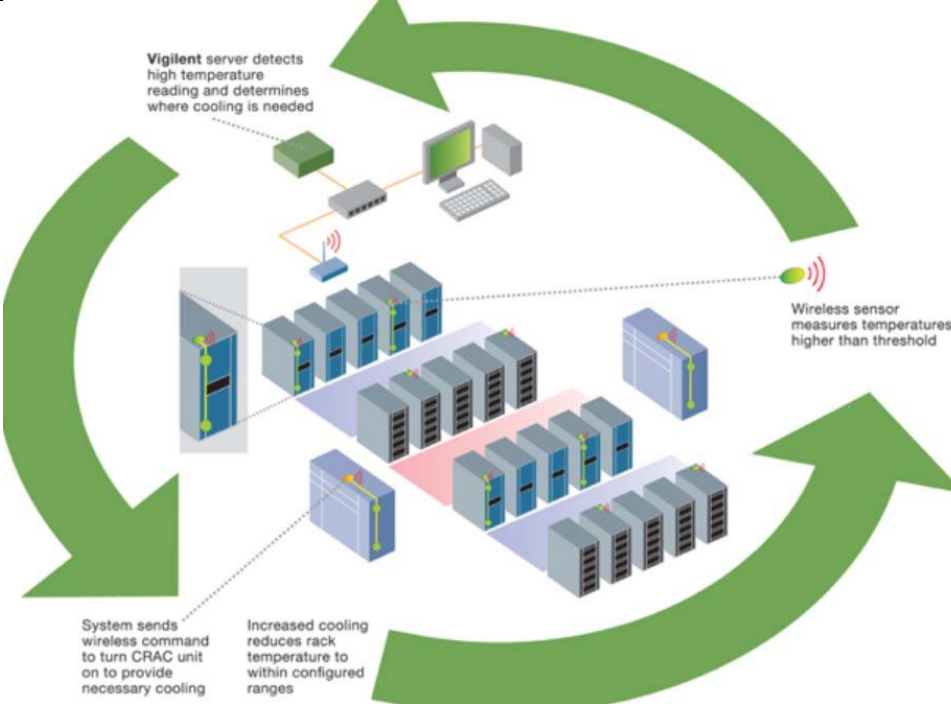
Claim 1	Exemplary Evidence of Infringement by NTT
[1pre] A method for cooling a room configured to house a plurality of computer systems, said method comprising:	<p>NTT’s data centers use a method for cooling a room configured to house a plurality of computer systems.</p> <p>For example, NTT uses Vigilent to manage cooling systems in its data centers.</p>  <p>https://www.vigilent.com/vigilent-and-ntt-facilities-deepen-strategic-relationship/</p>


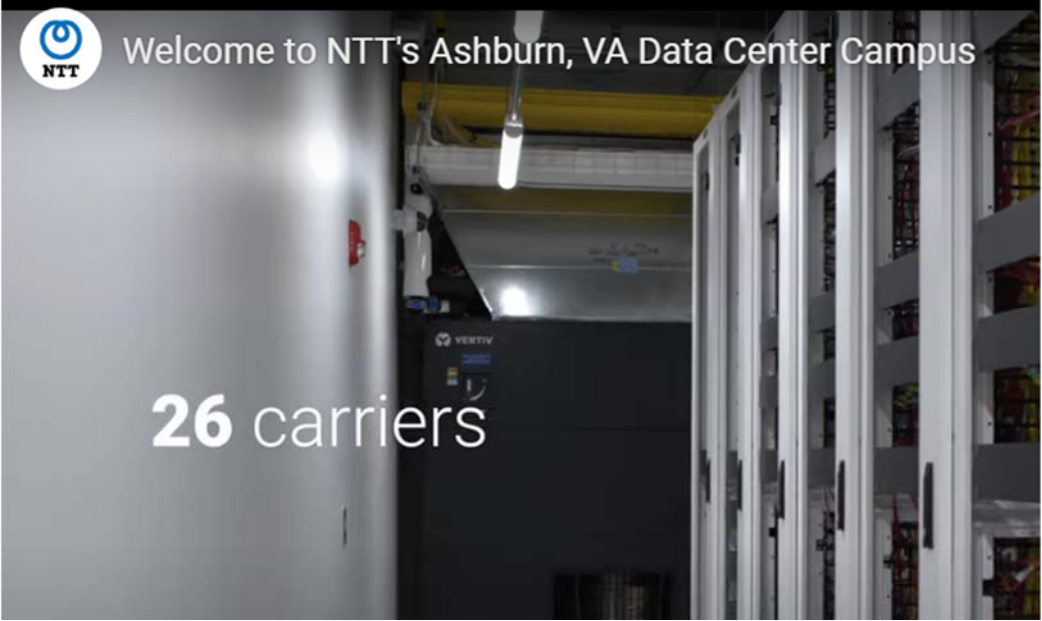
Claim 1	Exemplary Evidence of Infringement by NTT
	<div data-bbox="781 302 1285 427"></div> <div data-bbox="781 464 1157 563"><h1>Vigilent®</h1></div> <div data-bbox="781 609 1173 639"><h2>PROJECT AT-A-GLANCE</h2></div> <div data-bbox="781 646 1285 1026"><ul style="list-style-type: none">▪ NTT Communications set out to improve the overall energy efficiency of its two largest US data centers▪ Technology from Vigilent was used to manage cooling systems more efficiently▪ NTT managed to eliminate or power down nearly half of its existing cooling units▪ Savings included an overall 20% reduction in cooling energy used across the two sites▪ Other results included PUE improvements and a reduction in carbon emissions</div> <div data-bbox="798 1122 1883 1211"><p>Representatives from NTT Facilities and Vigilent discuss the results of NTT Facilities deploying the Vigilent Dynamic Cooling Management System.</p></div> <div data-bbox="745 1282 1568 1318"><p>https://www.vigilent.com/case-study-ntt-facilities-and-vigilent/</p></div>


Claim 1	Exemplary Evidence of Infringement by NTT
	<p>VIGILENT CONTINUOUSLY MATCHES COOLING OUTPUT TO HEAT LOAD</p> <p>Optimized airflow eliminates hot spots.</p> <p>Vigilent continuously optimizes the airflow in your facility, delivering improved reliability and availability. The system automatically finds and eliminates hot spots, while its comprehensive reports and tools facilitate easier operations management.</p> <p>Our system delivers the right amount of cooling exactly where it's needed. This typically results in up to a 40% reduction in carbon emissions and your cooling energy bill. We achieve that with sophisticated AI-based technology that learns your environment and adapts to change.</p>  <p>https://www.vigilent.com/who-we-serve/by-facility/data-centers/</p>

Claim 1	Exemplary Evidence of Infringement by NTT
	 <p>https://www.vigilent.com/who-we-serve/by-facility/data-centers/.</p> <p>Constantly adapting The AI engine constantly changes cooling when it detects new equipment and varying IT loads.</p> <p>Granular control & visibility The Vigilent system provides you with rack-level visibility, and automatically controls cooling resources to ensure you're getting the right amount of cooling to the locations you care about most.</p> <p>https://www.vigilent.com/who-we-serve/by-role/data-center-operator/.</p>


Claim 1	Exemplary Evidence of Infringement by NTT
	<p>Vigilent also detects high temperature readings and sends command to the cooling units to control the temperature.</p> <p>DYNAMIC CONTROL</p> <p>Automatic, real-time thermal management.</p> <p>The Vigilent Control System combines the temperature data gathered by the monitoring system with powerful machine learning. It automatically determines how to best adjust your facility's cooling resources – constantly and in real time – to match the current heat load, all while using the minimum amount of energy possible.</p> <p>https://www.vigilent.com/products-and-services/vigilent-dynamic-cooling-management-system/</p>



Claim 1	Exemplary Evidence of Infringement by NTT
	 <p>The diagram illustrates a closed-loop cooling control system for a data center. It features several server racks, a CRAC (Computer Room Air Conditioning) unit, and a vigilant server. A wireless sensor measures temperatures and sends data to the vigilant server. The server detects high temperature readings and determines where cooling is needed. The system then sends a wireless command to turn on the CRAC unit to provide necessary cooling. Increased cooling reduces the rack temperature to within configured ranges, which is then measured by the wireless sensor again, completing the loop.</p> <p>https://techcrunch.com/2012/03/26/vigilent-raises-6-7m-from-accel-for-intelligent-data-center-energy-management-system/?guccounter=1&guce_referrer=aHR0cHM6Ly93d3cuZ29vZ2xlLmNvbS8&guc e_referrer_sig=AQAAAHN5ro4OJaRHQi5FRCMvqn2bp-tTxvWCI3YIbeLD</p> <p>NTT also uses Vertiv (Liebert) cooling units in the colocation data center. Liebert cooling units are controlled by Liebert's iCOM Intelligent Communication and Monitoring system.</p>

Claim 1	Exemplary Evidence of Infringement by NTT
	<div data-bbox="758 261 1793 878"> Welcome to NTT's Ashburn, VA Data Center Campus 26 carriers </div> <p data-bbox="758 902 1793 971">https://services.global.ntt/en-us/services-and-products/global-data-centers/global-locations/americas/ashburn-va-1-data-center</p>

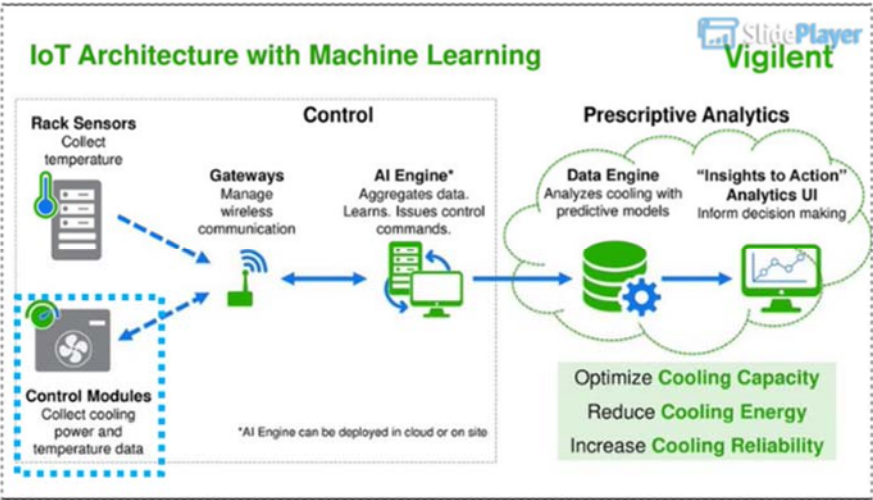
Claim 1	Exemplary Evidence of Infringement by NTT
	<div data-bbox="764 266 1879 862">  </div> <p data-bbox="751 885 1799 954"> https://services.global.ntt/en-us/services-and-products/global-data-centers/global-locations/americas/hillsboro-hill-data-center </p> <p data-bbox="764 982 1862 1133"> Maintaining optimal temperatures in a data vault is essential to keeping critical infrastructure up and running. At our Chicago CH1 Data Center, we recirculate the heat produced in each of the 6MW vaults using our Vertiv Liebert fan walls. As warm air is exhausted from densely stacked servers into a contained hot aisle, the fan walls output cool 75°F air at a rate designed to maintain a constant pressure differential between the cold and hot aisles of our clients' racks. The hot air is channeled into a common return plenum and then back to the fan walls where the cycle begins again. The units themselves are carefully placed throughout the vault to ensure that the entire vault meets the CFD modeling and hot spots are minimized. Click here to learn more about our Chicago data center. </p> <p data-bbox="751 1170 1715 1203"> https://services.global.ntt/en-us/insights/blog/chicago-construction-updates </p>

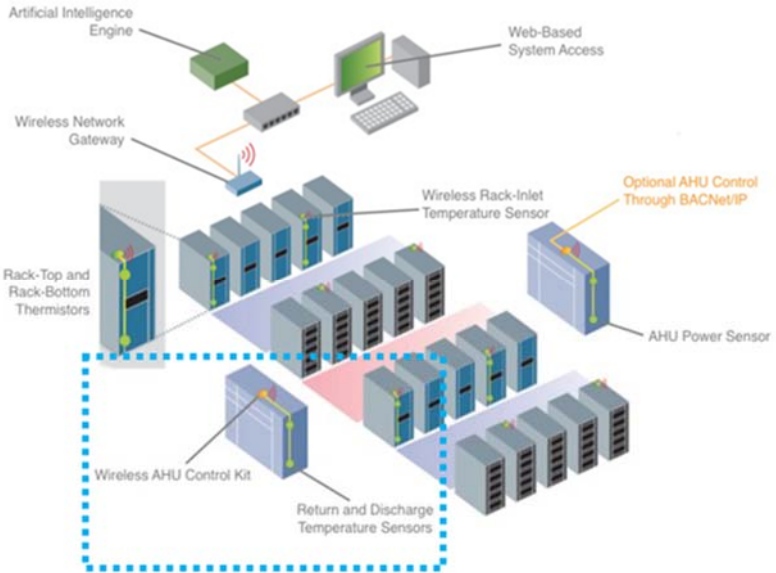
Claim 1	Exemplary Evidence of Infringement by NTT
	<p data-bbox="793 261 1535 362">With scalable pre-fabricated solutions like Vertiv™ SmartMod™ and the quickly deployed Power Module, Vertiv is standardizing modular systems so you can get your data center running, faster.</p> <p data-bbox="793 431 915 459">Vertiv.com</p>  <p data-bbox="758 919 1772 951">https://issuu.com/businessreviewusa/docs/bro_bc_usa_ragingwire_data_centers</p>


Claim 1	Exemplary Evidence of Infringement by NTT
	<p>SmartMod incorporates:</p> <ul style="list-style-type: none"> • Modular and scalable Vertiv™ Liebert® UPS power protection • Close-coupled in-row Liebert® CRD thermal management units with intelligent iCOM™ Edge controls <p>2</p> <p>https://www.vertiv.com/4ad535/globalassets/products/critical-power/integrated-solutions/vertiv-smartmod-na-brochure_0.pdf</p> <div data-bbox="756 888 1866 1213">  <p>The image shows a dark gray rectangular box containing the Vertiv logo (a stylized 'V' inside a circle) and the word 'VERTIV™' in white. To the right, the word 'Liebert®' is displayed in white. Below 'Liebert®', the text 'iCOM™ Thermal System Controls' is written, followed by 'Greater Data Center Protection, Efficiency & Insight' in a smaller font.</p> </div> <p>https://www.vertiv.com/49d637/globalassets/shared/liebert-icom-thermal-system-controls-brochure.pdf (“iCOM Brochure”).</p>

Claim 1	Exemplary Evidence of Infringement by NTT
	<p>At the cooling unit level, the Liebert iCOM unit control provides the highest protection available and optimal performance.</p> <ul style="list-style-type: none"> • Monitors 380 unit and component points to eliminate single points of failure • Self-healing features avoid passing unsafe operating thresholds • Highly intuitive, full-color, touch screen simplifies operations to save time and reduce human error • Multiple, automated unit protection routines, including lead/lag, cascade, rapid restart, refrigerant protection and valve calibration  <p>At the supervisory level, the Liebert iCOM-S system control offers a revolutionary way to harmonize and optimize thermal system performance to optimize capacity across the data center, gain quick access to actionable data, and automate system diagnostics and trending.</p> <ul style="list-style-type: none"> • Advanced monitoring and at-a-glance reporting on performance metrics and trends for efficiency, capacity and adverse events • Up to 50% system efficiency gains • 30% lower deployment costs • Teamwork modes that prevent conflict between units and allow them to adapt to changes in facility and IT demand to improve efficiency and availability and reduce system wear and tear – saving more than \$10,000 per unit per year in energy costs • Simple and easy to deploy — auto-configuration to detect and configure up to 4,800 sensors, eliminating the need for custom integration to building management systems and cutting sensor deployment times in half  <p>Liebert iCOM unit control and Liebert iCOM-S system control are available for new Vertiv™ data center cooling units or as retrofits.</p> <p>iCOM Brochure at p. 3.</p>
[1a] providing a plurality of heat exchanger units configured to receive air from said room and to deliver air to said room;	<p>NTT provides a plurality of heat exchanger units configured to receive air from said room and to deliver air to said room.</p> <p>For example, Vigilent’s dynamic cooling management activates NTT’s cooling units, that deliver and receive air from the room, and measures the return and discharge air temperatures.</p>


Claim 1	Exemplary Evidence of Infringement by NTT
	<p>MONITOR STATUS</p> <p>CRAC, CRAH, and AHU temperature sensors constantly measure the discharge and return air temperatures of your cooling equipment. This data is stored indefinitely to enable the detection of long-term trends.</p> <p>https://www.vigilent.com/products-and-services/monitoring/</p> <p>You can track different cooling unit variables, including:</p> <ul style="list-style-type: none"> • BOP is the control output, which is how the Vigilent system can adjust cooling units by turning them on or off • Discharge Air is the temperature of air being supplied to the facility by the cooling unit • Power Monitor will display the amount of power in kilowatts (kW) being used by that equipment • Return Air is the temperature of the air coming back into the cooling unit • Return and Discharge Temperature Sensors – Measures the return air and discharge air temperature for each cooling unit <p>https://fccid.io/ANATEL/01612-15-08292/MANUAL/16006226-67DD-49FB-8873-2E15C3330211/PDF, pp. 2, 24.</p>

Claim 1	Exemplary Evidence of Infringement by NTT
	 <p>The diagram, titled "IoT Architecture with Machine Learning" and presented by SlidePlayer Vigilant, illustrates a system for optimizing cooling capacity. It is divided into three main functional areas: Control, Prescriptive Analytics, and a feedback loop to the Control area.</p> <ul style="list-style-type: none"> Control Area: This central section includes: <ul style="list-style-type: none"> Rack Sensors: Collect temperature data. Gateways: Manage wireless communication between sensors and the AI Engine. AI Engine*: Aggregates data, learns, and issues control commands. Control Modules: Collect cooling power and temperature data, feeding back into the Rack Sensors. Prescriptive Analytics Area: This section is enclosed in a cloud-like shape and includes: <ul style="list-style-type: none"> Data Engine: Analyzes cooling with predictive models. "Insights to Action" Analytics UI: Informs decision making. Outcomes: The analytics lead to three specific goals: Optimize Cooling Capacity, Reduce Cooling Energy, and Increase Cooling Reliability. <p>A footnote at the bottom of the diagram states: "*AI Engine can be deployed in cloud or on site".</p> <p>https://slideplayer.com/slide/12118919/</p>

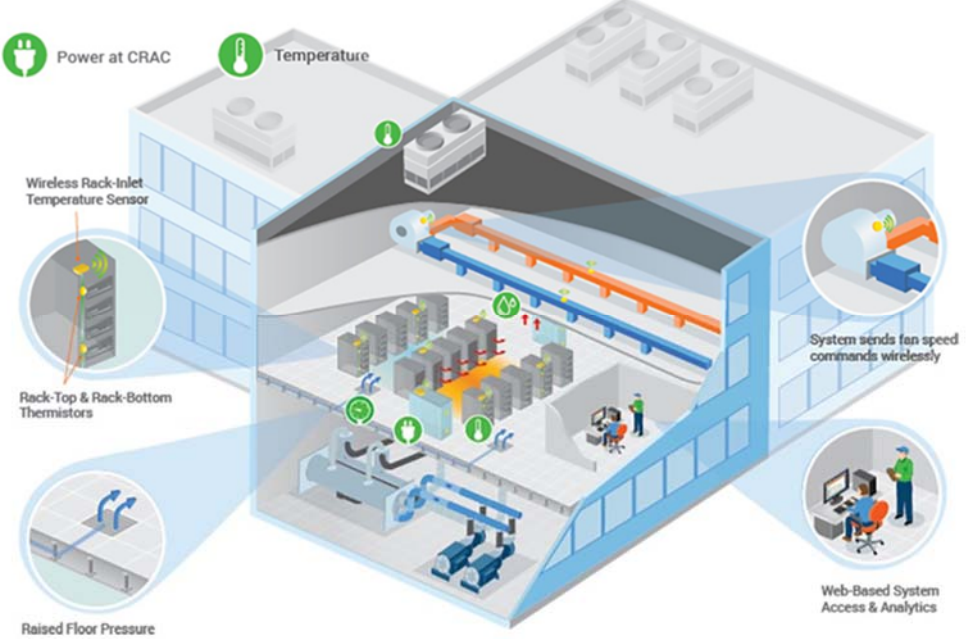
Claim 1	Exemplary Evidence of Infringement by NTT
	 <p>The diagram illustrates a server room monitoring system. At the top, an 'Artificial Intelligence Engine' (green box) is connected to a 'Web-Based System Access' (computer monitor and keyboard). A 'Wireless Network Gateway' (router) is connected to the AI engine and a 'Wireless Rack-Inlet Temperature Sensor' (blue box). The sensor is connected to a server rack. Other components include 'Rack-Top and Rack-Bottom Thermistors' (yellow dots on the rack), 'Optional AHU Control Through BACNet/IP' (orange text), 'AHU Power Sensor' (blue box), 'Wireless AHU Control Kit' (blue box), and 'Return and Discharge Temperature Sensors' (yellow dots on the floor). A dashed blue box highlights the 'Wireless AHU Control Kit' and the 'Return and Discharge Temperature Sensors'.</p> <p>https://slideplayer.com/slide/12118919/</p> <p>NTT also uses Liebert cooling units which are heat exchangers that receive air from the room and deliver cool conditioned air to the room by transferring heat from the air to a fluid.</p>

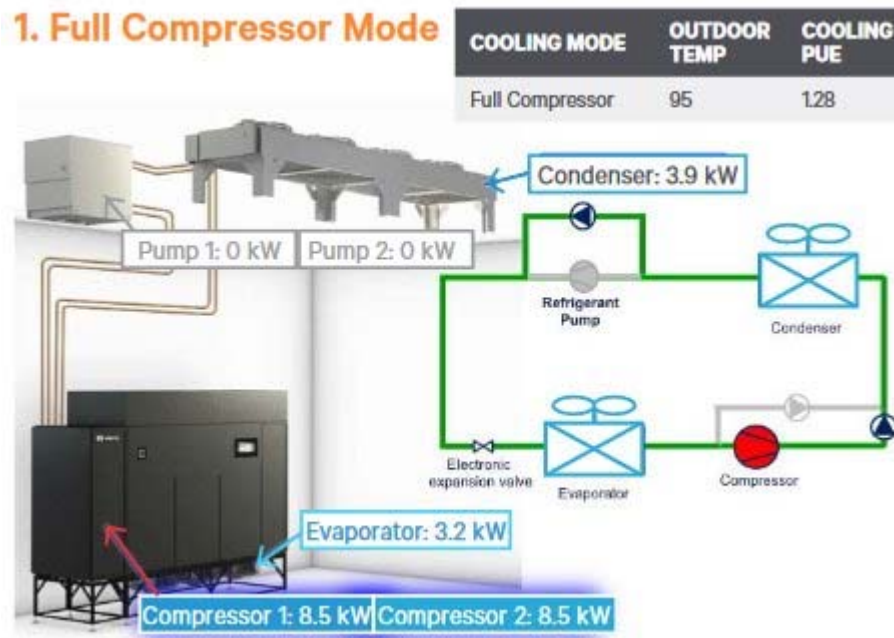
Claim 1	Exemplary Evidence of Infringement by NTT
	<div data-bbox="758 261 1793 878"> Welcome to NTT's Ashburn, VA Data Center Campus 26 carriers</div> <div data-bbox="751 899 1801 976">https://services.global.ntt/en-us/services-and-products/global-data-centers/global-locations/americas/ashburn-va-1-data-center</div>

Claim 1	Exemplary Evidence of Infringement by NTT
	<div data-bbox="764 266 1879 862" data-label="Image"> </div> <p data-bbox="751 883 1799 954"> https://services.global.ntt/en-us/services-and-products/global-data-centers/global-locations/americas/hillsboro-hill-data-center </p> <p data-bbox="764 980 1862 1133"> Maintaining optimal temperatures in a data vault is essential to keeping critical infrastructure up and running. At our Chicago CH1 Data Center, we recirculate the heat produced in each of the 6MW vaults using our Vertiv Liebert fan walls. As warm air is exhausted from densely stacked servers into a contained hot aisle, the fan walls output cool 75°F air at a rate designed to maintain a constant pressure differential between the cold and hot aisles of our clients' racks. The hot air is channeled into a common return plenum and then back to the fan walls where the cycle begins again. The units themselves are carefully placed throughout the vault to ensure that the entire vault meets the CFD modeling and hot spots are minimized. Click here to learn more about our Chicago data center. </p> <p data-bbox="751 1169 1715 1203"> https://services.global.ntt/en-us/insights/blog/chicago-construction-updates </p>

Claim 1	Exemplary Evidence of Infringement by NTT
	<p>With scalable pre-fabricated solutions like Vertiv™ SmartMod™ and the quickly deployed Power Module, Vertiv is standardizing modular systems so you can get your data center running, faster.</p> <p>Vertiv.com</p>  <p>https://issuu.com/businessreviewusa/docs/bro_bc_usa_ragingwire_data_centers</p>
[1b] supplying said plurality of heat exchanger units with cooling fluid from an air conditioning unit;	<p>NTT supplies said plurality of heat exchanger units with cooling fluid from an air conditioning unit.</p> <p>For example, NTT uses Vigilent's dynamic cooling management which supplies chilled water to the Computer Room Air Handler unit, CRAH (heat exchanger units) from a central chilled water plant.</p>

Claim 1	Exemplary Evidence of Infringement by NTT
	<p>Computer Room Air Conditioning unit. A standalone device sitting on the data center floor that provides cool air to the room via a fan. CRAC units usually have multiple local compressors and self-contained refrigerant as the cooling agent.</p> <p>CRAH Computer Room Air Handler unit. A standalone device sitting on the data center floor that provides cool air to the room via a fan. CRAH units typically use chilled water as the cooling agent that is supplied from a central chilled water plant in the facility.</p> <p>CT The Current Transducer (CT) is used with a power sensor to measure power of cooling units.</p> <p>CW Chilled Water unit. A type of CRAC unit that uses chilled water from a dedicated, onsite chiller plant to cool the discharge air.</p> <p>https://fccid.io/ANATEL/01612-15-08292/MANUAL/16006226-67DD-49FB-8873-2E15C3330211/PDF, Page 153.</p>

Claim 1	Exemplary Evidence of Infringement by NTT
	 <p>The diagram illustrates a data center environment with various monitoring and control components. Key elements include:</p> <ul style="list-style-type: none"> Power at CRAC: Indicated by a green plug icon. Temperature: Indicated by a green thermometer icon. Wireless Rack-Inlet Temperature Sensor: A sensor mounted on a server rack. Rack-Top & Rack-Bottom Thermistors: Sensors located at the top and bottom of server racks. Raised Floor Pressure: Indicated by a green icon of a raised floor. System sends fan speed commands wirelessly: A circular inset showing a server rack with a fan speed control icon. Web-Based System Access & Analytics: A circular inset showing a person at a computer monitor. <p>https://www.vigilent.com/products-and-services/monitoring/</p> <p>NTT also uses Liebert's cooling units which have an evaporator. Refrigerant cooling fluid flows through heat exchanger coils in evaporator.</p>

Claim 1**Exemplary Evidence of Infringement by NTT****1. Full Compressor Mode**

https://www.vertiv.com/49f1fd/globalassets/products/thermal-management/room-cooling/liebert-dse-sales-brochure-sl-18927_00.pdf

NTT uses Liebert cooling units which have a chilled water control valve. Chilled watercooling fluid flows through heat exchanger coils in evaporator.

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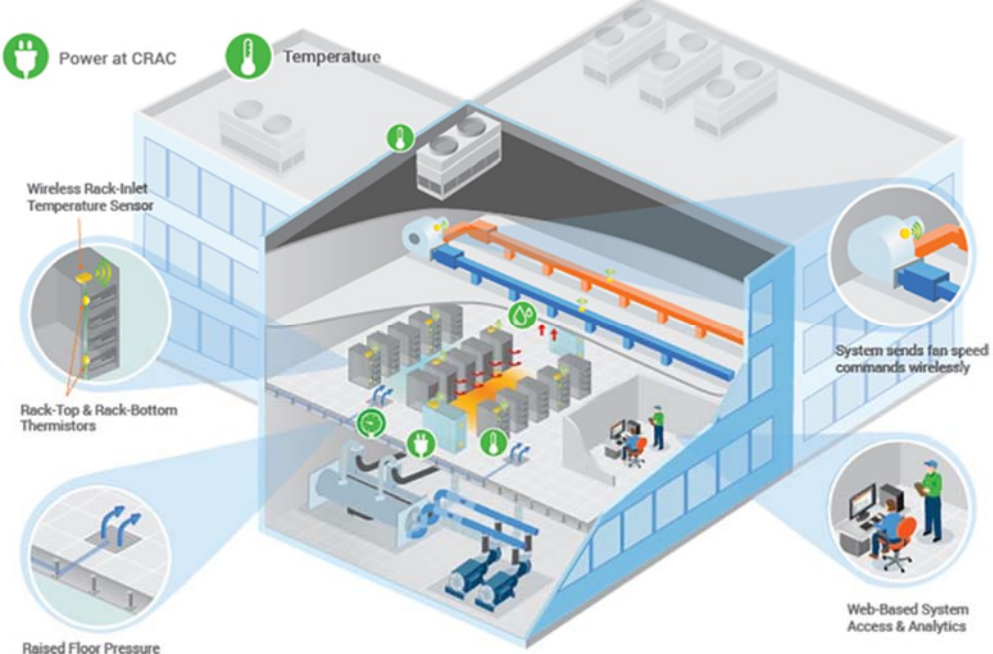
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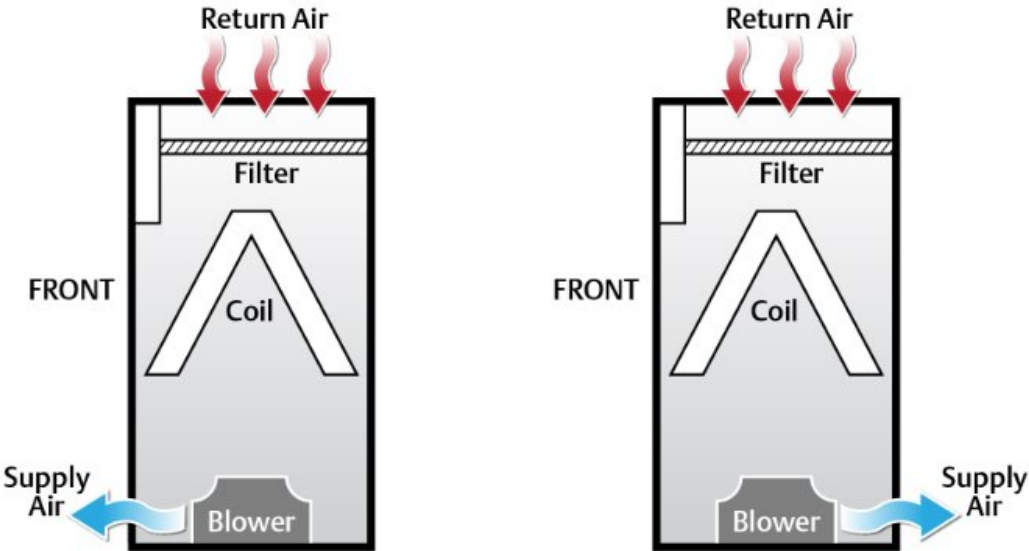
Chilled Water Control Valve

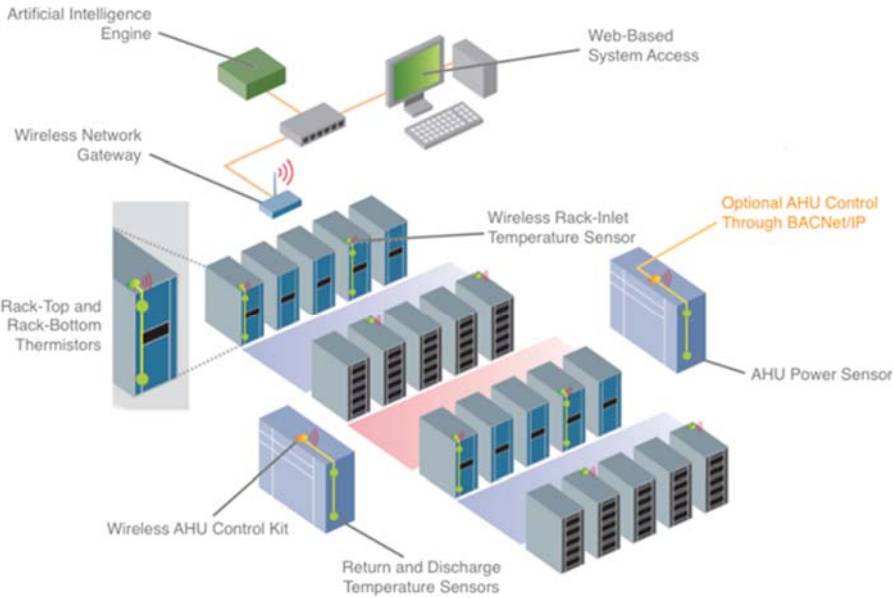
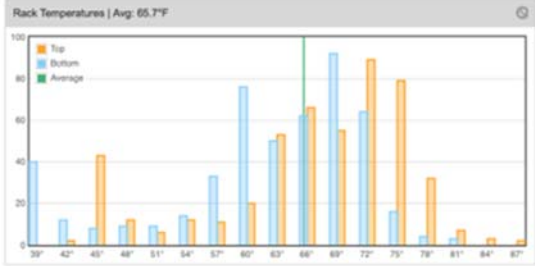
The chilled water valve provides proportional control action in response to room temperature and humidity as sensed by the microprocessor control. It includes operating linkage and electronic motor. Unlike other systems of this nature it requires no over-travel linkage or end switches to be adjusted. The control uses "intelligent logic" to eliminate valve hunting, thus greatly increasing the life of the valve. The valve can be a 3-way or 2-way to meet the appropriate requirements of the installed system.



Claim 1	Exemplary Evidence of Infringement by NTT
	https://www.vertiv.com/491dda/globalassets/products/thermal-management/room-cooling/liebert-cw-brochure.pdf .
<p>[1c] cooling said received air through heat exchange with the cooling fluid in the plurality of heat exchanger units;</p>	<p>NTT cools said received air through heat exchange with the cooling fluid in the plurality of heat exchanger units.</p> <p>For example, NTT uses Vigilent's dynamic cooling management which supplies chilled water to the Computer Room Air Handler unit, CRAH (heat exchanger units) from a central chilled water plant.</p> <p>Computer Room Air Conditioning unit. A standalone device sitting on the data center floor that provides cool air to the room via a fan. CRAC units usually have multiple local compressors and self-contained refrigerant as the cooling agent.</p> <p>CRAH Computer Room Air Handler unit. A standalone device sitting on the data center floor that provides cool air to the room via a fan. CRAH units typically use chilled water as the cooling agent that is supplied from a central chilled water plant in the facility.</p> <p>CT The Current Transducer (CT) is used with a power sensor to measure power of cooling units.</p> <p>CW Chilled Water unit. A type of CRAC unit that uses chilled water from a dedicated, onsite chiller plant to cool the discharge air.</p> <p>https://fccid.io/ANATEL/01612-15-08292/MANUAL/16006226-67DD-49FB-8873-2E15C3330211/PDF, Page 153.</p>

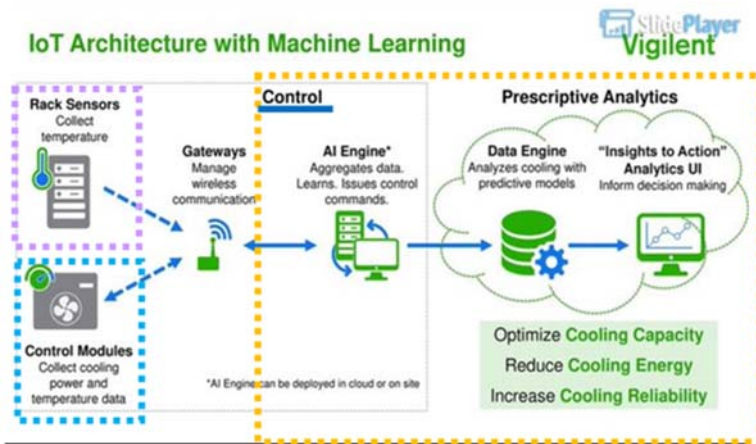
Claim 1	Exemplary Evidence of Infringement by NTT
	 <p>The diagram illustrates a data center environment with various monitoring and control components. Key elements include:</p> <ul style="list-style-type: none"> Power at CRAC: Indicated by a green plug icon. Temperature: Indicated by a green thermometer icon. Wireless Rack-Inlet Temperature Sensor: A sensor mounted on a server rack. Rack-Top & Rack-Bottom Thermistors: Sensors located at the top and bottom of server racks. Raised Floor Pressure: Indicated by a green icon of a raised floor. System sends fan speed commands wirelessly: A circular inset showing a server rack with a fan speed control icon. Web-Based System Access & Analytics: A circular inset showing a person at a computer monitor. <p>https://www.vigilent.com/products-and-services/monitoring/</p> <p>NTT also uses Liebert cooling units to cool fluid (refrigerant) through the coil. The cooling fluid through the coil is chilled water/glycol. Liebert cooling units receive the “return air” from the room and deliver cool conditioned “supply air” to the room, by transferring heat from the air to the cooling fluid within the coil.</p>

Claim 1	Exemplary Evidence of Infringement by NTT
	 <p>https://www.vertiv.com/4afe7d/globalassets/products/thermal-management/room-cooling/liebert-dse-80-165kw-23-43-tons-downflow-system-design-manual.pdf, pp. 3, 6.</p>
[1d] sensing temperatures at one or more locations in said room;	<p>NTT senses temperatures at one or more locations in said room.</p> <p>For example, NTT uses Vigilant's dynamic cooling management which reads rack sensors (deployed on the plurality of server racks) configured to measure inlet and outlet temperatures across the data center.</p> <p>Wireless Rack-Inlet Temperature Sensor – Wireless sensor that measures temperature at the top and bottom of the rack inlet.</p> <p>Rack-Top and Rack-Bottom thermistors – Attached via a cable sleeve, these are the physical monitoring points for each temperature sensor.</p>

Claim 1	Exemplary Evidence of Infringement by NTT
	<p data-bbox="758 261 1843 331">https://fccid.io/ANATEL/01612-15-08292/MANUAL/16006226-67DD-49FB-8873-2E15C3330211/PDF, p. 2.</p>  <p data-bbox="758 1003 1843 1073">https://fccid.io/ANATEL/01612-15-08292/MANUAL/16006226-67DD-49FB-8873-2E15C3330211/PDF, p. 1.</p> 

Claim 1	Exemplary Evidence of Infringement by NTT
	<p data-bbox="758 261 1843 331">https://fccid.io/ANATEL/01612-15-08292/MANUAL/16006226-67DD-49FB-8873-2E15C3330211/PDF, p. 4.</p> <p data-bbox="774 370 1066 407">Wireless Sensors</p> <p data-bbox="774 438 1520 526">Wireless sensors are typically deployed every third rack to measure the inlet air temperature every minute. The sensors have two thermistors, one to capture temperature at rack bottom, the other at rack top.</p> <p data-bbox="774 570 1520 688">Wireless sensors are also used to monitor return and supply air temperature, and the power consumed, by each cooling unit. Sensors are also available to measure other environmental conditions, namely pressure and humidity.</p> <p data-bbox="774 732 1520 850">The sensors are based on advanced mesh networking technology, which allows each node to be both a source and repeater for other nodes, allowing the network to automatically self-configure and be resilient to intermittent outages or changes in site layout.</p> <p data-bbox="758 894 1499 932">https://www.vigilent.com/technology/system-architecture/</p> <p data-bbox="758 954 1860 1024">NTT also uses Liebert cooling units and the Liebert cooling unit control system senses temperatures at the supply sensor, remote sensor, or return sensor locations.</p>

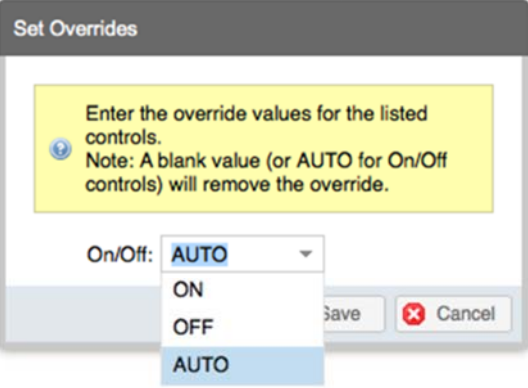
Claim 1	Exemplary Evidence of Infringement by NTT																					
	<p>3.1.12 Automatic Fan Speed Control</p> <p>Temperature sensors can control fan speed using one of three modes based on the type of sensor selected as the fan-control sensor: supply, return, or remote, see Table 3.2 below . Control is based on the selected sensor for both fan control and temperature control and their setpoints as follows:</p> <ul style="list-style-type: none">• Coupled: The fan control and temperature control sensor selection is the same. When coupled, fan speed is determined by the temperature setpoints.• Decoupled: The fan control and temperature control sensor selection is different. When decoupled, fan speed is determined by the fan setpoints. <p>Table 3.2 Fan Speed Controlling Sensor Options</p> <table><tr><th colspan="2" rowspan="2"></th><th colspan="3">Temperature Control Sensor Selected</th></tr><tr><th>Supply Sensor</th><th>Remote Sensor</th><th>Return Sensor</th></tr><tr><td rowspan="3">Fan Control Sensor Selected</td><td>Supply Sensor</td><td>Coupled</td><td>N/A</td><td>N/A</td></tr><tr><td>Remote Sensor</td><td>Decoupled (Recommended)</td><td>Coupled</td><td>N/A</td></tr><tr><td>Return Sensor</td><td>Decoupled</td><td>Decoupled</td><td>Coupled</td></tr></table> <p>https://www.vertiv.com/49b8b2/globalassets/shared/liebert-icom-user-manual_sl-31075.pdf, p. 45.</p>			Temperature Control Sensor Selected			Supply Sensor	Remote Sensor	Return Sensor	Fan Control Sensor Selected	Supply Sensor	Coupled	N/A	N/A	Remote Sensor	Decoupled (Recommended)	Coupled	N/A	Return Sensor	Decoupled	Decoupled	Coupled
				Temperature Control Sensor Selected																		
		Supply Sensor	Remote Sensor	Return Sensor																		
Fan Control Sensor Selected	Supply Sensor	Coupled	N/A	N/A																		
	Remote Sensor	Decoupled (Recommended)	Coupled	N/A																		
	Return Sensor	Decoupled	Decoupled	Coupled																		
[1e] controlling at least one of the temperature of said cooling fluid and said air delivery by said plurality of heat exchanger units to said room in response to said sensed temperatures at said one or more locations; and	<p>NTT controls at least one of the temperature of said cooling fluid and said air delivery by said plurality of heat exchanger units to said room in response to said sensed temperatures at said one or more locations.</p> <p>For example, NTT uses Vigilent’s dynamic cooling management to generate an airflow for an optimal cooling output using the CRAH unit based on the temperature of the rack sensors.</p>																					

Claim 1	Exemplary Evidence of Infringement by NTT
	<p>Computer Room Air Conditioning unit. A standalone device sitting on the data center floor that provides cool air to the room via a fan. CRAC units usually have multiple local compressors and self-contained refrigerant as the cooling agent.</p> <p>CRAH</p> <p>Computer Room Air Handler unit. A standalone device sitting on the data center floor that provides cool air to the room via a fan. CRAH units typically use chilled water as the cooling agent that is supplied from a central chilled water plant in the facility.</p> <p>https://fccid.io/ANATEL/01612-15-08292/MANUAL/16006226-67DD-49FB-8873-2E15C3330211/PDF, pp. 157, 158</p>  <p>The diagram, titled "IoT Architecture with Machine Learning" and "Vigilent", illustrates a data flow from sensors to analytics. On the left, "Rack Sensors" (collecting temperature) and "Control Modules" (collecting power and temperature data) are connected via "Gateways" (managing wireless communication) to an "AI Engine". The AI Engine aggregates data, learns, and issues control commands. This engine feeds into "Prescriptive Analytics", which includes a "Data Engine" (analyzing cooling with predictive models) and an "Analytics UI" (providing insights to inform decision making). The final outcomes are to "Optimize Cooling Capacity", "Reduce Cooling Energy", and "Increase Cooling Reliability". A note states: "*AI Engine can be deployed in cloud or on site".</p> <p>https://slideplayer.com/slide/12118919/</p>

Claim 1	Exemplary Evidence of Infringement by NTT																					
	<p>Using wireless temperature sensors, the system collects granular information about the thermal environment of your facility. Temperature sensors are placed every three to four racks measuring temperature at the top and bottom of the rack. Thermal data is communicated via a wireless mesh network back to the control software.</p> <p>The AI control software uses the real-time thermal data to learn and build an airflow model of the environment. The model is used to determine the optimal cooling output to ensure that the thermal environment is maintained with a minimal amount of energy.</p> <p>The software then makes active control decisions for each cooling unit. The Data Center Control section provides more detail on the different control capabilities of the system. The real-time temperature monitoring provides thermal feedback as the software begins to control the environment. This constant monitoring and control response occurs automatically and dynamically to optimize your thermal environment.</p> <p>https://fccid.io/ANATEL/01612-15-08292/MANUAL/16006226-67DD-49FB-8873-2E15C3330211/PDF, pp. 102, 103.</p> <p>NTT also uses Liebert cooling units which have temperate sensors that control fan speed in response to sensed temperatures.</p> <h3>3.1.12 Automatic Fan Speed Control</h3> <p>Temperature sensors can control fan speed using one of three modes based on the type of sensor selected as the fan-control sensor: supply, return, or remote, see Table 3.2 below . Control is based on the selected sensor for both fan control and <u>temperature control and their setpoints as follows:</u></p> <ul style="list-style-type: none">• Coupled: The fan control and temperature control sensor selection is the same. When coupled, fan speed is determined by the temperature setpoints.• Decoupled: The fan control and temperature control sensor selection is different. When decoupled, fan speed is determined by the fan setpoints. <p>Table 3.2 Fan Speed Controlling Sensor Options</p> <table><tr><th colspan="2" rowspan="2"></th><th colspan="3">Temperature Control Sensor Selected</th></tr><tr><th>Supply Sensor</th><th>Remote Sensor</th><th>Return Sensor</th></tr><tr><td rowspan="3">Fan Control Sensor Selected</td><td>Supply Sensor</td><td>Coupled</td><td>N/A</td><td>N/A</td></tr><tr><td>Remote Sensor</td><td>Decoupled (Recommended)</td><td>Coupled</td><td>N/A</td></tr><tr><td>Return Sensor</td><td>Decoupled</td><td>Decoupled</td><td>Coupled</td></tr></table>			Temperature Control Sensor Selected			Supply Sensor	Remote Sensor	Return Sensor	Fan Control Sensor Selected	Supply Sensor	Coupled	N/A	N/A	Remote Sensor	Decoupled (Recommended)	Coupled	N/A	Return Sensor	Decoupled	Decoupled	Coupled
				Temperature Control Sensor Selected																		
		Supply Sensor	Remote Sensor	Return Sensor																		
Fan Control Sensor Selected	Supply Sensor	Coupled	N/A	N/A																		
	Remote Sensor	Decoupled (Recommended)	Coupled	N/A																		
	Return Sensor	Decoupled	Decoupled	Coupled																		

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	<p>https://www.vertiv.com/49b8b2/globalassets/shared/liebert-icom-user-manual_sl-31075.pdf, p. 45.</p> <p>The Liebert cooling unit controls activates the flow of chilled water/glycol, and varies cooling capacity by adjusting a motorized ball valve.</p> <p>7.1.4 Temperature Control with a Fluid Economizer</p> <p>When an economizer is installed, the cooling requirement (determined by the temperature proportional band) is addressed first by the economizer's secondary cooling. If the economizer cooling capacity is insufficient, the compressor(s) begin cooling to bring the room air temperature down to the temperature setpoint.</p> <p>The fluid economizer employs a motorized ball valve that controls the flow of chilled water/glycol to provide a cooling capacity from 0% to 100%.</p> <p>https://www.vertiv.com/49b8b2/globalassets/shared/liebert-icom-user-manual_sl-31075.pdf, p. 110.</p>
<p>[1f] wherein the step of controlling said air delivery by said plurality of heat exchanger units comprises individually manipulating a mass flow rate of the cooling fluid supplied to each of the plurality of heat exchanger units.</p>	<p>NTT controls said air delivery by said plurality of heat exchanger units comprises individually manipulating a mass flow rate of the cooling fluid supplied to each of the plurality of heat exchanger units.</p> <p>For example, NTT uses Vigilent's dynamic cooling management to control the water flow supplied to each cooling unit automatically based on the measured temperature.</p> <p>CRAH Computer Room Air Handler unit. A standalone device sitting on the data center floor that provides cool air to the room via a fan. CRAH units typically use chilled water as the cooling agent that is supplied from a central chilled water plant in the facility.</p> <p>WtrFlow Measured volumetric water flow rate.</p> <p>https://fccid.io/ANATEL/01612-15-08292/MANUAL/16006226-67DD-49FB-8873-2E15C3330211/PDF, p. 153.</p>

Claim 1	Exemplary Evidence of Infringement by NTT
	<p>Using wireless temperature sensors, the system collects granular information about the thermal environment of your facility. Temperature sensors are placed every three to four racks measuring temperature at the top and bottom of the rack. Thermal data is communicated via a wireless mesh network back to the control software.</p> <p>The AI control software uses the real-time thermal data to learn and build an airflow model of the environment. The model is used to determine the optimal cooling output to ensure that the thermal environment is maintained with a minimal amount of energy.</p> <p>The software then makes active control decisions for each cooling unit. The Data Center Control section provides more detail on the different control capabilities of the system. The real-time temperature monitoring provides thermal feedback</p> <p><small>Thermal data is communicated via a wireless mesh network back to the control software. The AI control software uses the real-time thermal data to learn and build an airflow model of the environment. The model is used to determine the optimal cooling output to ensure that the thermal environment is maintained with a minimal amount of energy. The software then makes active control decisions for each cooling unit. The Data Center Control section provides more detail on the different control capabilities of the system. The real-time temperature monitoring provides thermal feedback.</small></p> <p>https://fccid.io/ANATEL/01612-15-08292/MANUAL/16006226-67DD-49FB-8873-2E15C3330211/PDF, pp. 102, 103.</p> <p>How does the software control each cooling unit?</p> <p>There are many differences in how a cooling unit can be controlled. Some units can only be turned ON and OFF. Some have Variable Frequency Drives (VFDs) for fan speed control, and others have been retrofitted with EC Plug Fans, which also have fan speed control. The Vigilant System is designed to work with all of these units and even a mix of different types.</p> <p>The Vigilant system controls the HVAC equipment to keep each zone temperature within its set point, configured by the user in the Set Points tab, while reducing airflow energy. The reduced airflow conserves energy by reducing fan power and putting less demand on chiller plants and boilers.</p> <p>https://fccid.io/ANATEL/01612-15-08292/MANUAL/16006226-67DD-49FB-8873-2E15C3330211/PDF, pp. 104, 107.</p>

Claim 1	Exemplary Evidence of Infringement by NTT
	 <p> https://fccid.io/ANATEL/01612-15-08292/MANUAL/16006226-67DD-49FB-8873-2E15C3330211/PDF, p. 47 </p> <p>NTT also uses Liebert cooling units which have Teamwork mode. Teamwork mode evaluates changes in the air temperature of the inlet, outlet, or supply temperature of the heat dissipating devices and adjusts one or more cooling units controls to provide the required cooling capacity.</p> <h3>6 Teamwork, Standby and Rotation for Cooling Units</h3> <p>U2U communication via private network and additional hardware (see U2U Networking on page 95) allows the following operating features for the cooling units:</p> <ul style="list-style-type: none"> • Teamwork • Standby (Rotation) • Cascade

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	<p data-bbox="758 321 1801 391">https://www.vertiv.com/49b8b2/globalassets/shared/liebert-icom-user-manual_sl-31075.pdf, p. 99.</p> <p data-bbox="783 423 1344 451">6.2.3 Teamwork Mode 1—Parallel Operation</p> <p data-bbox="783 483 1822 505">In Teamwork mode 1, fan speed and cooling capacity are ramped up in parallel, which means that all units operate identically.</p> <p data-bbox="783 529 1780 607">Teamwork mode 1 is best for small rooms with balanced heat loads. A master unit collects the controlling readings for temperature and humidity from all the operating (fan on) units in the group, then determines the average or worst-case reading, and sends operating instructions to efficiently distribute cooling capacity across available units.</p> <p data-bbox="783 631 1675 652">In Teamwork mode 1, most parameters are shared and, when set in any unit, are set in all units in the group.</p> <p data-bbox="783 685 1413 712">6.2.4 Teamwork Mode 2—Independent Operation</p> <p data-bbox="783 745 1822 850">Teamwork mode 2 works well for most applications, and best in large rooms with un-balanced heat loads by preventing units in a group from operating in opposing modes, some cooling and some heating. All temperature and humidity parameters are shared by the group. The master unit monitors all available unit-sensor readings and determines the demand for cooling, heating, humidification and dehumidification, then sends operating instructions to address the greatest demand.</p> <p data-bbox="783 875 1822 953">In Teamwork mode 2, the setpoints for all units must be identical. The proportional band, deadband, and related settings may differ by unit. Fan speed is modulated per unit. Rotation and cascading is not available, so expect uneven distribution of work hours.</p> <p data-bbox="783 985 1451 1013">6.2.5 Teamwork Mode 3—Optimized Aisle Operation</p> <p data-bbox="783 1045 1833 1094">In Teamwork Mode 3, the fan speed for all units operates in parallel, which means fan speed operation is identical at each unit. However, cooling capacity operates independently for each unit.</p> <p data-bbox="783 1118 1833 1284">Teamwork mode 3 takes advantage of variable speed fan options and variable capacity component options to maintain rooms with an unbalanced load and to prevent units in a group from operating in opposing modes. All units operate in the same mode based on the average or worst case (maximum) readings from the unit sensors. A local control (cooling capacity supply sensor) provides input to manage and maintain the discharge-air temperature at each unit. In addition, fan speed and operation are controlled based on readings from the unit temperature or static pressure sensors to control air delivery to the cold aisle.</p> <p data-bbox="758 1317 1801 1386">https://www.vertiv.com/49b8b2/globalassets/shared/liebert-icom-user-manual_sl-31075.pdf, p. 102.</p>

Claim 1	Exemplary Evidence of Infringement by NTT
	<p>The Liebert cooling units also have standby mode. Standby mode evaluates changes in the air temperature of the inlet, outlet, or supply temperature of the heat dissipating devices and activates/de-activates one or more cooling units to provide the required cooling capacity.</p> <p>6.3 Assigning Cooling Units to Standby (Lead/Lag)</p> <p>Standby assigns some units to operate while others are on standby, meaning a unit is idle but ready to become active in the event of an alarm condition in one of the operating units or based on a rotation schedule.</p> <p>When a unit is in standby mode, fan(s) are off and no cooling occurs. In multiple cooling unit systems, assigning units to standby lets you:</p> <ul style="list-style-type: none"> • Configure redundancy in case of failure scenarios (standby). • Manage cooling unit run time (lead/lag). See Setting a Rotation Schedule on the next page . • Modulate for very low loads to full design load (to be temperature reactive) by cascading activation of standby units (configured when setting up teamwork mode). <p>https://www.vertiv.com/49b8b2/globalassets/shared/liebert-icom-user-manual_sl-31075.pdf, p. 103.</p>